

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

v.

\$30,509.00 in U.S. CURRENCY,  
Defendant *In Rem*.

Civil No.:

**VERIFIED COMPLAINT  
FOR FORFEITURE *IN REM***

The United States of America brings this Verified Complaint for Forfeiture *In Rem* under Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

**Nature of the Action**

1. This is a civil action *in rem* , seeking forfeiture of: (1) any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity” (as defined in section [18 U.S.C. § 1956(c)(7)]), 18 U.S.C. § 981(a)(1)(A) and proceeds traceable to “unlawful acts” (as defined in 21 U.S.C §841(a)(1)); and (2) all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. § 801, *et seq.* , all proceeds traceable to such an exchange, and all moneys, negotiable

instruments, and securities used or intended to be used to facilitate any violation of 21 U.S.C. § 801, *et seq*, 21 U.S.C. §§ 881(a)(6).

### **Jurisdiction and Venue**

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(A).

3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant currency pursuant to 28 U.S.C. § 1355(b)(1)(A) because the acts and omissions giving rise to the forfeiture occurred in this district.

### **The Defendant *In Rem***

4. The Defendants *In Rem* is \$30, 509.00 in U.S. Currency seized from Welvin Gomez- Martinez on September 30, 2021 at the Luis Muñoz Marin International Airport.

5. The Defendant *In Rem* is within the possession, custody, or control of the United States.

### **Bases for Forfeiture**

6. The Defendant *In Rem* is subject to forfeiture as property, real or personal, which constitute or is derived from proceeds traceable to an offense constituting a specified unlawful activity, pursuant to 18 U.S.C. § 981(a)(1)(A) and moneys, negotiable instruments, securities, or other things of value furnished or

intended to be furnished by any person in exchange for a controlled substance, pursuant to 21 U.S.C. § 881(a)(6)

### **Facts Supporting Forfeiture**

7. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration.

### **Claim for Relief**

The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendant *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30<sup>th</sup> day of March 2022.


W. STEPHEN MULDROW  
United States Attorney

s/ Manuel Muñiz-Lorenzi  
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VERIFICATION

I, Danielle Kluger, depose and say that I am a Special Agent with the Drug Enforcement Administration and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Amended Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 30th day of March 2022.

  
Danielle Kluger, Special Agent  
Drug Enforcement Administration